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Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, D.C. 20554

Re: **NOTICE OF EX PARTE COMMUNICATION BY TRANSACTION NETWORK SERVICES, INC.**
WC Docket No. 17-59: *Advanced Methods to Target and Eliminate Unlawful Robocalls*

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Federal Communications Commission's rules, Transaction Network Services, Inc. ("TNS"), by its attorneys, hereby gives notice that it met with individuals of the Consumer and Governmental Affairs Bureau of the FCC on Tuesday, August 24, 2021. In attendance on behalf of TNS were: Jim Tyrrell, Senior Director, Product Marketing, Lavinia Kennedy, Director, Product Management, and Arthur Toy, Product Manager. Also in attendance was TNS' outside counsel, Steven A. Augustino of Kelley Drye & Warren. LLP.. In attendance on behalf of the FCC were Mark Stone, Jerusha Burnett, Aaron Garza and Kristi Thornton. The meeting was held telephonically.

The purpose of the meeting was to discuss the Petition for Reconsideration and Request for Clarification ("Petition") filed by USTelecom on May 6, 2021 relating to notifications of call blocking.¹ TNS supports the Petition, and agrees with USTelecom's recent assessment that in the near term, use of SIP Code 603 is the only way providers can reasonably implement call blocking notification.² TNS explained that it already supports the use of SIP Code 603 for notifications of call blocking. This code is known in the industry and many providers already use the code for this purpose. Moreover, SIP Code 603 provides actionable information for call originators to investigate and, if justified, seek redress for erroneous blocking. Therefore, the Commission should clarify its rules or, if necessary, modify the rules to allow use of SIP Code 603 exclusively for call blocking notifications.

¹ Petition for Reconsideration and Request for Clarification of USTelecom – The Broadband Association, CG Docket No. 17-59 (filed May 6, 2021) ("Petition").

² See Ex Parte Notice of USTelecom, at 1-2, CG Docket No. 17-59 (filed July 27, 2021).

TNS explained that numerous technical and cost considerations impede the use of SIP Codes 607 or 608 as additional or alternative notification methods. With respect to SIP Code 607, this code does not provide more information than code 603 and therefore return of either code would provide timely notification to the call originator. However, in TNS' experience SIP Code 607 can be misinterpreted by call originators (or, more likely, by the call originator's voice service provider) as a temporary or isolated call failure. TNS implemented SIP Code 607 for a large customer but when the customer returned a SIP Code 607 on blocked calls, calls were re-presented multiple times in response to the code. This instance lead to as many as 10-20 retries on the same call, requiring the terminating provider to process multiple instances of the same call attempt and to send multiple blocking notifications. If this were to occur across the broader network, use of SIP Code 607 (without a standard implementation by all providers and call originators) could significantly increase call queries, requiring additional capacity and resources for terminating carriers and analytics engines.

With respect to SIP Code 608, TNS explained that support for the optional jCard parameter presents multiple technical complexities at this time. First, TNS pointed out that the FCC's rule does not mention the jCard and do not appear to require transmission of a jCard.³ Some call originators are requesting use of the jCard with SIP Code 608, however.

The jCard is an optional parameter of SIP Code 608 per the December 2019 Draft Standard RFC8688 of the Internet Engineering Task Force (IETF).⁴ The jCard provides contact information that identifies who to contact to request redress for the telephone number. A jCard may be inserted with SIP Code 608, per this proposal, if it is determined that the calling party will not use the content of the jCard for malicious purposes. Security and integrity of the jCard data is provided by encapsulating it within a JSON Web Token.

Support for this jCard presents multiple challenges. First, the standard is still a proposal. Without guidance from the standards body, the calling party experience will be inconsistent since the jCard is an optional parameter. Second, SIP Code 608 with the jCard parameter would require interworking with legacy network elements that don't support the jCard. It requires the intermediary network element that issues the 608 code to play an announcement if none of the network elements in the call path support the jCard. As a result, an additional node, such as a Media Resource Function (MRF), would be needed, adding significant complexity and expense. If the call transits across a TDM network and all of the SIP elements in the call path support the jCard, the gateway that provides the ISUP/SIP interworking will also be required to transcode the jCard text into speech (TTS) and play the announcement. This is potentially an additional expense to the carrier and may require enhancements to convert a jCard to TTS before playing the announcement. Third, the jCard must be secured. To ensure the

³ *Advanced Methods to Target and Eliminate Unlawful Robocalls*, Fourth Report and Order, 35 FCC Rcd 15221, ¶ 56 (2020) (requiring providers to return code 607 or 608 "as appropriate"); See 47 C.F.R. § 64.1200(k)(9)(i) (requiring "the use of Session Initiation Protocol (SIP) code 607 or 608").

⁴ The draft standard and history are available at: <https://datatracker.ietf.org/doc/rfc8688/> (last visited 08/26/2021).

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integrity, security, and proper validation of the jCard, the industry would be required to create and support an infrastructure and governance model similar to what was implemented for STIR/SHAKEN. This has not been developed at this point, and doing so would be particularly challenging for providers that have recently deployed modifications to implement STIR/SHAKEN in the first place.

For these reasons, TNS requests that the Commission act quickly on the USTelecom Petition. It should clarify that providers need only send SIP Code 603 at this time and defer any requirement relating to SIP Codes 607 or 608 until standards bodies have finalized the standards and the technical complexities have been addressed. TNS requests that the Commission act quickly in order to provide the industry with sufficient time before the deadline to implement call blocking notification.

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This *ex parte* notification is being filed electronically with the Commission pursuant to Section 1.1206 of the Commission's Rules. Please do not hesitate to contact me with any questions or concerns.

Respectfully submitted,

A handwritten signature in black ink, reading "Steven A. Augustino". The signature is fluid and cursive, with the first name "Steven" written in a stylized, elongated manner.

Steven A. Augustino

Counsel for Transaction Network Services, Inc.

cc: FCC personnel listed above